

UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TENNESSEE

LIBERTY LEGAL FOUNDATION;  
JOHN DUMMETT;  
LEONARD VOLODARSKY;  
CREG MARONEY,

Plaintiffs

v.

NATIONAL DEMOCRATIC PARTY  
of the USA, Inc.;  
DEMOCRATIC NATIONAL  
COMMITTEE;  
TENNESSEE DEMOCRATIC PARTY;  
DEBBIE WASSERMAN SCHULTZ;  
CHIP FORRESTER,

CASE NO: 2:12-cv-02143-cgc

On Notice of Removal of Case  
No. CH-11-1757-3 from Chancery  
Court for the State of Tennessee in  
Shelby County

Defendants

**PLAINTIFFS' MOTION FOR EXTENSION OF TIME**

Pursuant to Rule 7 of the Federal Rules of Civil Procedure, the Plaintiffs respectfully move this Court for an extension of time to file responses to Defendants' motions to dismiss, pending this Court's ruling on Plaintiffs' motion to remand the above-named case to the Chancery Court for the State of Tennessee in Shelby County.

Grounds for this motion, as set forth more fully in the accompanying memorandum of law, are that Plaintiffs' should not be required to respond to

multiple motions to dismiss when this Court is likely to remand this case to state court.

Respectfully submitted this 14<sup>th</sup> Day of March, 2012, by:

s/Van R. Irion  
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Attorney for Plaintiffs

#### CERTIFICATE REGARDING CONSULTATION

Pursuant to this Court's Local Rule 7.2(a)(1)(B), counsel for the Plaintiffs hereby certifies that upon consultation with opposing counsel, accord could not be reached regarding the instant motion. Said consultation was made with attorneys Ben Gastel and Gerard Stranch via e-mail on March 5 and 6, 2012.

s/Van R. Irion  
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Attorney for Plaintiffs

#### CERTIFICATE OF SERVICE

It is hereby certified that on March 14, 2012, a copy of "Plaintiffs' Motion for Extension of Time" was filed electronically. A copy of this motion will be served upon the Defendants through the Court's electronic filing system.

s/Van R. Irion  
Van R. Irion